

Ackerman, Joyce

From: Stovall - CDPHE, Curtis <curtis.stovall@state.co.us>
Sent: Monday, November 27, 2017 3:41 PM
To: Thomas Krasovec
Cc: Richard Dean; Ackerman, Joyce; Dave Folkes, PE; Walker - CDPHE, David; MacGregor - CDPHE, Kelly; Piggott, Amelia; O'Reilly, Maureen; jason.king@coag.gov
Subject: CDPHE Comments on Air Monitoring Plan
Attachments: CDPHE Comments on Air Monitoring PlanDraft11-27-2017.docx

Tom,

As follow-up to our phone conversation a short time ago, attached are our comments on the Air Monitoring Plan for Neuhauser Landfill. Please call Dave Walker at (303) 692-3354 if you have questions about the comments.

Thanks,
Curt

--

Curt Stovall, P.E.
Environmental Protection Specialist
Solid Waste Permitting Unit
Solid Waste and Materials Management Program



COLORADO
Hazardous Materials
& Waste Management Division
Department of Public Health & Environment

P 303.692.2295 | F 303.759.5355
4300 Cherry Creek Drive South, Denver, Colorado 80246-1530
curtis.stovall@state.co.us | www.colorado.gov/cdphe/hm

CDPHE Comments on Air Monitoring Plan (November 27, 2017)
Drum Remediation Neuhauser Landfill

CDPHE Comments on Ambient Air Monitoring Plan

1. Section 3.2 of the Ambient Air Monitoring Plan (AAMP) provides project specific air quality objectives for the Time -Integrated Ambient Air Sampling (Time-Integrated Sampling) results for three specific volatile organic compounds (VOCs) (methyl ethyl ketone, toluene and trichloroethylene). Additional site-specific air quality objectives will have to be calculated if other VOCs are detected in the Time-Integrated Sampling results.
2. Neither Section 3.2 nor Section 3.3 discuss how the “Baseline Time-Integrated Sampling” results will be used when making decisions regarding the need for emissions control measures. It is CDPHE’s preference that the baseline Time-Integrated Sampling results concentrations NOT be subtracted from the perimeter Time-Integrated Sampling results prior to comparison to the site-specific air quality objectives. This will require further discussion in the event that concentrations of any of the VOCs detected in the baseline Time-Integrated Sampling results are already above the site-specific air quality objectives.
3. The third paragraph of Section 3.1 (page 10) of the AAMP indicated that the real-time air monitoring action level will be 2.0 parts per million (ppm) above background for the exclusion zone fence line and 1.0 parts per billion (ppb) at the property perimeter. However, neither the text nor Figure 3 of the AAMP specifically identify which of the perimeters shown is the exclusion zone boundary and which is the property perimeter. Revise the text and/or Figure 3 of the AAMP to clearly identify the exclusion zone perimeter boundary and the property perimeter boundary.
4. Sections 3.1, 3.2, 3.3 and 4.2 of the AAMP do not state how quickly that exceedances of the Real-Time Action Levels will be reported to the remediation project manager. Timely reporting of exceedance so the Real-Time Action Levels is a critical component of the air monitoring program. Revise the AAMP to provide timeframes for reporting the exceedances of the Real-Time Action Levels. Based on the statement provided in Section 3.4 (page 15) that work activities will cease if action levels are sustained over a 30-minute monitoring interval, the reporting time frame should be a maximum of 30-minutes.
5. The description of the “third tier” and “fourth tier” action levels in the last paragraph of Section 3.1 (page 11) is not consistent with the two-tiers of action levels described in Section 3.4 (page 15). Revise the last paragraph of Section 3.1 (page 11) to delete the discussion of third tier action level and change the fourth tier action level (cease remediation work) to be the second tier action level. Also, revise the first sentence of the last paragraph of Section 3.4 to state that second tier action level will be based on a 30-minute monitoring interval and that the remediation project manager will be notified immediately so that work activities can be ceased per Section 3.4.

6. Revise the first sentence of Section 3.3 (page 14) to state “and/or property perimeter” and revise the second sentence to specifically state the two different Real-Time Action Levels.
7. Revise Section 3.3 and Section 3.4 to describe the proposed response to an exceedance of the Time-Integrated Air Quality Objectives.
8. Section 4 of the AAMP does not specify when the Real-Time Monitoring Data and the Time-Integrated Sampling Data will be reported to the regulatory agencies and the Town of Erie. Revise Section 4 of the AAMP to specify that exceedances of the Real-Time Action Levels and/or exceedances of the Time-Integrated Air Quality Objectives will be reported to CDPHE and the Town of Erie by 10:00 am of the next working day after an exceedance of the Real-Time Action Level occurs and/or data is received indicating the Time-Integrated Air Quality Objectives have been exceeded. The report must also include a summary of the actions taken to reduce air emissions in response to the exceedance.